

REMARKS/ARGUMENTS

In response to the Examiner's Office Action of June 8, 2007 the Applicant respectfully submits the accompanying Amendment of the claims and the below Remarks.

Regarding Amendment

In the Amendment:

claim 4 is amended to properly depend from claim 3;
claim 20 is amended to properly depend from claim 18; and
claims 1-3 and 5-18 are unchanged.

It is respectfully submitted that the Amendment does not add any new matter to the present application.

Regarding Claim Objections

It is respectfully submitted that the above-described amendments of claims 4 and 20 provide the corrections required by the Examiner.

Regarding 35 USC 112, second paragraph Rejections

It is respectfully submitted that the claims 1 and 2 are clearly directed to a method (i.e., a method of manufacturing a series of integrated circuits), claims 3-10 are clearly directed to a product (i.e., a series of integrated circuits and a first integrated circuit of that series) which incorporates a feature determined by the method of claim 1 (i.e., the determined identifier of each integrated circuit), and claims 11-18 and 20 are clearly directed to a method (i.e., a method of injecting a key into a target integrated circuit) which incorporates a feature of the product of claim 10 (i.e., the message generated by the first integrated circuit).

Regarding 35 USC 102(e) Rejections

It is respectfully submitted that the subject matter of claims 1-3, 5 and 7-17 is not disclosed by Mi et al. (US 2002/0116616), for at least the following reasons.

Pending independent claim 1 clearly recites that the identifiers are "determined in such a way that knowing the identifier of one of the integrated circuits does not improve the ability of an attacker to determine the identifier of any of the other integrated circuits" (emphasis added). Accordingly, it is clear that a unique identifier is determined for each integrated circuit of the series, as is described at paragraphs [6588]-[6594] of the present specification.

On the other hand, Mi specifically discloses at paragraph [0021] that because the "processor number is only statistically unique, it is possible for more than one platform or device to have the same processor number". Thus, the processor numbers which identifier the processors of Mi can be determined in such a way that knowing the processor number of one processor improves the ability of an attacker to determine the identifier of any other processor, which is clearly contrary to the requirements of pending claims 1-18 and 20.

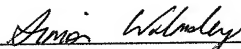
Regarding 35 USC 103(a) Rejections

It is respectfully submitted that the subject matter of pending claims 4, 6, 18 and 20 is not taught or suggested by Mi in view of Debry (US 6,314,521) and/or Collins et al. (US 7,055,029), because neither Debry nor Collins provides any disclosure which would motivate one of ordinary skill in the art to modify the disclosed system of Mi to result in the claimed features of claims 1-18 and 20.

It is respectfully submitted that all of the Examiner's objections and rejections have been traversed. Accordingly, it is submitted that the present application is in condition for allowance and reconsideration of the present application is respectfully requested.

Very respectfully,

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